

September 13, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Heartburn Free*	Orange (Citrus sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene	Dietary Supplement to relieve occasional heartburn, acid indigestion, & upset stomach*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: Robert C. Doster
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 9-13-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

97S 0162 LET 8610

HFlp

77986
825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM

September 14, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.	Heartburn Free*	Orange (Citrus sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene	Heartburn Free will not reduce mineral absorption or inhibit protein digestion*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

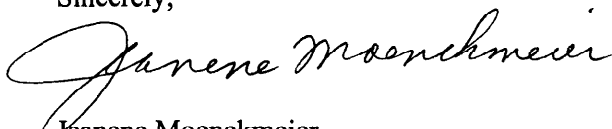
By: Robert C. Doster
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: 9-14-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

HF2p

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September 18, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

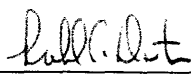
RE: Label Claims/Disclaimers

Dear Sir/Madam:

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.	Heartburn Free*	Orange (Citrus sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene	Does not interfere with protein digestion or mineral absorption*

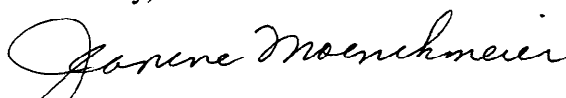
I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 9-18-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

HF4p

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September 19, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204


RE: Label Claims/Disclaimers

Dear Sir/Madam:

This letter is to notify you that PhytoPharmica at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product.

<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto- Pharmica (a Division of Integrative Therapeutics Inc.)	Heartburn Free*	Orange (Citrus sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene	Heartburn Free does not shut down acid production nor adversely affect acid- producing cells.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date: 9-19-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,


Jeanene Moenckmeier
Director of Legal Affairs

HF5p

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September 20, 2001

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington, DC 20204

RE: Label Claims/Disclaimers

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
Phyto-Pharmica (a Division of Integrative Therapeutics Inc.)	Heartburn Free*	Orange (Citrus sinensis) Peel Extract, standardized to contain a minimum of 98.5% d-limonene	Does not disrupt stomach acids, allowing proper digestion.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica has substantiation that the statements are truthful and not misleading.

By: _____

Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date: _____

9-20-01

If you have any questions, please contact Jeanene Moenckmeier, Director of Legal Affairs at (920) 469-4440.

Sincerely,

Jeanene Moenckmeier
Director of Legal Affairs

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